

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

Medical Quant USA, Inc.,)	CASE NO.: 1:21 cv 877
)	
Plaintiff(s))	JUDGE PATRICIA A. GAUGHAN
)	
vs.)	
)	DECLARATION IN SUPPORT OF
Radiant Life Technologies Ltd.,)	PLAINTIFF'S, MEDICAL QUANT USA,
)	INC. DBA MULTI-RADIANCE,
Defendant(s))	MOTION FOR DEFAULT JUDGMENT
)	AGAINST DEFENDANT RADIANT
)	LIFE TECHNOLOGIES LTD
)	

I, Stephen H. Jett, pursuant to 28 U.S.C § 1746, declare as follows:

1. I am an attorney licensed to practice in the State of Ohio and before this Court.
2. I have practiced law in Ohio, in both federal and state courts, for approximately 30 years.
3. I am a partner at the law firm Buckingham Doolittle & Burroughs, LLC.
4. I am the attorney of record for the Plaintiff, Medical Quant USA, Inc. dba Multi-Radiance Medical ("Multi-Radiance"), in this action.
5. As the attorney for Multi-Radiance, I have personal knowledge of the facts set forth below, except for those facts which are stated on information and belief. If called upon to testify, I could testify truthfully to the following facts.
6. I am informed and believe that Radiant Life Technologies, LTD ("RL") is an entity headquartered in Cyprus. Accordingly, based upon information and belief, RL is not an infant or incompetent person.
7. Based on information and belief, RL is not a person protected by the Soldiers' and Sailors Civil Relief Act, nor is RL an officer or agency of the United States.

8. To date, I have spent 23.4 hours prosecuting this case on behalf of Multi-Radiance at the hourly rate of \$350.
9. Matthew D. Smith, an associate at Buckingham Doolittle & Burroughs, LLC, who is an attorney licensed to practice in the State of Ohio and before this Court, has spent 64.6 hours prosecuting, researching, and assisting me in this matter on behalf of Multi-Radiance at the hourly rate of \$230.
10. Accordingly, Multi-Radiance has incurred attorney fees totaling at least \$23,028. In addition, Multi-Radiance has incurred costs totaling \$ 434.00 in prosecuting this matter against RL.
11. Based on my thirty (30) years of experience and my familiarity with the rates charged by other attorneys in Cleveland, Ohio of similar experience and expertise, I believe the fees and costs incurred by Multi-Radiance in this matter are reasonable and appropriate.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 4th day of August, 2021.



Stephen H. Jett

Attorney for Medical Quant USA, Inc. dba Multi-Radiance Medical